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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

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6  
7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA  
9

10 PARNELL COLVIN,  
11 PLAINTIFF.

12 CASE NO: 2:22-CV-APG-NJK  
13 <sup>01837</sup>

14 VS.

15 MOTION TO EXTEND TIME TO REPLY  
16 TO COURT ORDER FIRST REQUEST.

17 TAKO LLC,  
18 DEFENDANT.  
19 \_\_\_\_\_/

20 COMES NOW plaintiff Parnell Colvin, and requesting the Honorable court to grant him  
21 an extention until December 2, 2022 to file his response to the courts order. This reuest is made  
22 because plaintiff has had a pending case with the United States National Labor Relation Board,  
23 for the last 3 plus years and plaintiff has finally got a set court date for the trial dated this  
24 November 8, 2022. Plaintiff has been working relentless with the general counsel to prepare for  
25 trial and was told the trial could last a week or more. especially since the start of the trial is the same  
26 week as the federal holiday Veterans Day November 11, 2022.  
27

1        Plaintiff has submitted the ORDER RESCHEDULING HEARING from the  
2        UNITED STATES NATIONAL LABOR RELATIONS BOARD, as the court will see from the order  
3        please see Exhibit (1). This case has been reset many times over the years and now has a set date  
4        plaintiff has been working and involved with the preparations with this case for years working with  
5        many general counsel attorneys. Plaintiff request to the court is not for any purposes for any delays  
6        this request is being made in good faith, plaintiff at this time will not have the sufficient time to reply  
7        to the courts order by November 16, 2022 do to the trial starting November 8, 2022 and this is the  
8        basis of plaintiff request for an extention of time to file his relpy to the courts order.  
9

10  
11        Initially this case was set for trial in 2019, but got delayed then covit-19 delayed the case now  
12        plaintiff has a new court date set for November 8, 2022 through out all the years plaintiff has been  
13        and stayed actively involved. Thanking the court for its time and consideration of plaintiff motion.  
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CERTIFICATE OF SERVICE

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This is to certify that I have this day served a copy of the foregoing pleading, by depositing same in the United States mail with adequate postage thereon to assure delivery to

DEFENDANT:

TAKO LLC  
2411 TARAGATO AVE  
HENDERSON, NV 89052

DATED THIS november 4, 2022

  
\_\_\_\_\_  
PARNELL COLVIN

EXHIBIT #1

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 28**

**LABORERS INTERNATIONAL UNION OF NORTH  
AMERICA LOCAL 872, AFL-CIO  
(Various Employers, including the Employer-Members  
of Nevada Contractors Association / Associated General  
Contractors Association)**

**and**

**PARNELL COLVIN, an Individual**

**Cases 28-CB-239339  
28-CB-291889**

**and**

**RICHARD VELA, an Individual**

**Case 28-CB-292114**

**ORDER RESCHEDULING HEARING**

On August 1, 2022, an Order Consolidating Cases, Consolidated Complaint and Notice of Hearing (Complaint) issued in this proceeding, scheduling a hearing for 9:00 a.m. (local time) on a date to be determined, and on consecutive days thereafter until concluded, at a location and by a means and method to be determined.

On September 23, 2022, an Order Scheduling Hearing issued, scheduling the hearing to commence on December 6, 2022, at the same time, and at a location and by a means and method to be determined.

On October 7, 2022, Respondent filed a Motion to Continue Hearing based on scheduling conflicts of its counsel. Respondent proposed that the hearing be held either before December 6, 2022 (which it preferred) or after December 19, 2022. Additionally, Respondent requested that the hearing be held in-person, in Las Vegas, Nevada.

On October 10, 2022, the Charging Parties filed an Opposition Motion, opposing any continuance to the December 6, 2022 hearing date. In its Opposition Motion, the Charging Parties agreed with Respondent that the hearing date should be moved up from December 6, and that the hearing should be held in-person in Las Vegas.

On October 14, 2022, an Order Rescheduling Hearing and Designating Place of Hearing issued, rescheduling the hearing for November 1, 2022, at the same time as previously noticed, and designated the hearing to commence at the Hearing Room, National Labor Relations Board, 300 Las Vegas Boulevard South, Suite 2-901, Las Vegas, Nevada.

Subsequent to the issuance of the Order Rescheduling Hearing and Designating Place of Hearing, the Region learned that the November 1 hearing date is unavailable to the Region. Furthermore, Respondent's counsel informed the Region of a potential conflict the week of November 1 that involves another hearing referenced in Respondent's Motion to Continue Hearing. Accordingly,

**IT IS ORDERED** that the hearing in this matter be, and the same is, rescheduled to commence on November 8, 2022, at the same time and place as previously noticed.

Dated at Phoenix, Arizona, this 19<sup>th</sup> day of October, 2022.

/s/ Cornele A. Overstreet

Cornele A. Overstreet, Regional Director